

Serial No.: 10/684,417
Docket No.: 102-1001
Amendment After Final dated: February 19, 2008
Reply to the Final Office Action of December 21, 2007

REMARKS

Introduction

Applicant notes with appreciation the Examiner's indication that claims 7-9 would be allowable if rewritten in independent form. However, it is respectfully submitted that all of the pending claims 1-25 are allowable for at least the reasons presented below.

Upon entry of the foregoing amendment, claims 1-25 are pending in the application. Claims 1, 10, 19, and 24 have been amended. No new matter is being presented. In view of the following remarks, reconsideration and allowance of all the pending claims are requested.

Entry of this Amendment is proper under 37 C.F.R. §1.116 because the claim amendments: (a) place this application in condition for allowance (for the reasons discussed herein), (b) do not raise any new issues requiring further search and/or consideration (since the amendments amplify issues previously discussed throughout prosecution as indicated in the Final Office Action), (c) present the rejected claims in better form for consideration on appeal (should an appeal be necessary), and (d) are necessary and were not earlier presented because they are made in response to arguments raised in the Final Office Action.

Accordingly, for at least the reasons discussed above, entry of this Amendment is respectfully requested.

1. Rejection under 35 USC §102(b): JP '246:

Claims 1-6, 10-14 and 19-25 have been rejected under 35 U.S.C. §102(b) as being anticipated by Japanese Publication No. 4-72246 (hereinafter "JP '246"). Applicant respectfully requests reconsideration and withdrawal of this rejection for at least the following reasons.

a. Claim 1:

With respect to independent claim 1, on page 2 of the Office Action mailed on December 21, 2007 (hereinafter the "Office Action), the Examiner alleges that JP '246 discloses all of the limitations of the invention as recited in this claim. Applicant respectfully submits that this claim is currently amended to more clearly define the supporting plate in order to further distinguish the invention as claimed from the documents cited by the Examiner. Accordingly, it is

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respectfully submitted that none of the references cited by the Examiner discloses, teaches, or suggests all of the limitations presently recited in independent claim 1.

In particular, JP '246 is directed to a bearing installation plate 7 to automatically center a bearing 6 pressed against a roller axis 3b. See JP '246, Abstract. That is, JP '246 describes that the bearing installation plate 7 is movably abutted into a stay 5 by a moving projection 12. *Id.* In other words, JP '246 describes a freely movable bearing installation plate 7 mounted on the stay 5. This is not the same as "a supporting plate coupled at opposite ends thereof to a body of the image-forming device and installed at the paper-discharging port side of the image-forming device," as presently recited in independent claim 1.

Accordingly, it is respectfully submitted that since JP '246 does not teach all of the elements presently set forth in claim 1, this claim is patentably distinguishable from JP '246, and withdrawal of this rejection and allowance of this claim are respectfully solicited.

b. Claims 2-6:

With respect to dependent claims 2-6, it is respectfully submitted that these claims depend from independent claim 1, which is patentably distinguishable from JP '246 for at least the reasons provided above. Accordingly, since claims 2-6 contain each of the features as presently recited in independent claim 1, dependent claims 2-6 are also patentably distinguishable from JP '246, and withdrawal of this rejection and allowance of these claims are respectfully solicited.

c. Claim 10:

With respect to independent claim 10, Applicant respectfully submits that this claim is currently amended to more clearly define the supporting plate in order to further distinguish the invention as claimed from the documents cited by the Examiner. Accordingly, it is respectfully submitted that none of the references cited by the Examiner discloses, teaches, or suggests all of the limitations presently recited in independent claim 10.

In particular, as described above, JP '246 is directed to a bearing installation plate 7 to automatically center a bearing 6 pressed against a roller axis 3b. See JP '246, Abstract. That is, JP '246 describes that the bearing installation plate 7 is movably abutted into a stay 5 by a

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moving projection 12. *Id.* In other words, JP '246 does not describe that the bearing installation plate 7 is coupled to a body of the apparatus, but instead describes a freely movable bearing installation plate 7 mounted on the stay 5. This is not the same as "a supporting plate formed on the paper-discharging port side of the image-forming apparatus having opposite ends thereof fixedly coupled to a body of the image-forming apparatus," as presently recited in independent claim 10.

Accordingly, it is respectfully submitted that since JP '246 does not teach all of the elements presently set forth in claim 10, this claim is patentably distinguishable from JP '246, and withdrawal of this rejection and allowance of this claim are respectfully solicited.

d. Claims 11-14:

With respect to dependent claims 11-14, it is respectfully submitted that these claims depend from independent claim 10, which is patentably distinguishable from JP '246 for at least the reasons provided above. Accordingly, since claims 11-14 contain each of the features as presently recited in independent claim 10, dependent claims 11-14 are also patentably distinguishable from JP '246, and withdrawal of this rejection and allowance of these claims are respectfully solicited.

e. Claim 19:

With respect to independent claim 19, Applicant respectfully submits that this claim is currently amended to more clearly define the supporting plate in order to further distinguish the invention as claimed from the documents cited by the Examiner. Accordingly, it is respectfully submitted that none of the references cited by the Examiner discloses, teaches, or suggests all of the limitations presently recited in independent claim 19.

In particular, as described above, JP '246 is directed to a bearing installation plate 7 to automatically center a bearing 6 pressed against a roller axis 3b. See JP '246, Abstract. That is, JP '246 describes that the bearing installation plate 7 is movably abutted into a stay 5 by a moving projection 12. *Id.* In other words, JP '246 does not describe that the bearing installation plate 7 is coupled to a body of the apparatus, but instead describes a freely movable bearing installation plate 7 mounted on the stay 5. This is not the same as "a supporting plate formed

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on a paper-discharging port side of the image-forming device having opposite ends thereof mounted on a body of the image forming device,” as presently recited in independent claim 19.

Accordingly, it is respectfully submitted that since JP '246 does not teach all of the elements presently set forth in claim 19, this claim is patentably distinguishable from JP '246, and withdrawal of this rejection and allowance of this claim are respectfully solicited.

f. Claims 20-23:

With respect to dependent claims 20-23, it is respectfully submitted that these claims depend from independent claim 19, which is patentably distinguishable from JP '246 for at least the reasons provided above. Accordingly, since these claims contain each of the features as presently recited in independent claim 19, dependent claims 20-23 are also patentably distinguishable from JP '246, and withdrawal of this rejection and allowance of these claims are respectfully solicited.

g. Claim 24:

With respect to independent claim 24, Applicant respectfully submits that this claim is currently amended to more clearly define the supporting plate in order to further distinguish the invention as claimed from the documents cited by the Examiner. Accordingly, it is respectfully submitted that none of the references cited by the Examiner discloses, teaches, or suggests all of the limitations presently recited in independent claim 24.

In particular, as described above, JP '246 is directed to a bearing installation plate 7 to automatically center a bearing 6 pressed against a roller axis 3b. See JP '246, Abstract. That is, JP '246 describes that the bearing installation plate 7 is movably abutted into a stay 5 by a moving projection 12. *Id.* In other words, JP '246 does not describe that the bearing installation plate 7 is coupled to a body of the apparatus, but instead describes a freely movable bearing installation plate 7 mounted on the stay 5. This is not the same as “a supporting plate positioned at a paper-discharging port side of the image forming device and fixedly mounted at opposite ends thereof to a body of the image forming device,” as presently recited in independent claim 24.

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Accordingly, it is respectfully submitted that since JP '246 does not teach all of the elements presently set forth in claim 24, this claim is patentably distinguishable from JP '246, and withdrawal of this rejection and allowance of this claim are respectfully solicited.

h. Claim 25:

With respect to dependent claim 25, it is respectfully submitted that this claim depends from independent claim 24, which is patentably distinguishable from JP '246 for at least the reasons provided above. Accordingly, since claim 25 contains each of the features as presently recited in independent claim 24, dependent claim 25 is also patentably distinguishable from JP '246, and withdrawal of this rejection and allowance of this claim are respectfully solicited.

2. Rejection under 35 USC §102(b): JP '082:

Claims 1 and 10-25 have been rejected under 35 U.S.C. §102(b) as being anticipated by Japanese Publication No. 5-43082 (hereinafter "JP '082"). Applicant respectfully requests reconsideration and withdrawal of this rejection for at least the following reasons.

a. Claim 1:

With respect to independent claim 1, Applicant respectfully submits that this claim is currently amended to more clearly define a coupling of the supporting plate and the supporting bracket in order to further distinguish the invention as claimed from the documents cited by the Examiner. Accordingly, it is respectfully submitted that none of the references cited by the Examiner discloses, teaches, or suggests all of the limitations presently recited in independent claim 1.

In particular, JP '082 is directed to an opening and closing door 25 which supports carrying rollers 33 and a spring support shaft 34. See JP '082, Abstract, FIGS. 3-5. However, as illustrated in FIGS. 3-4, JP '082 describes an element 30 to support the carrying rollers 33 which is attached to the opening door 25 by a screw A. That is, the screw A connects an outer portion of the element 30, outside of the area supporting the carrying rollers 33, to the opening door 25. See JP '082, FIGS. 3-5. JP '082 does not describe a middle portion of the element 30, nor describe connecting a middle portion of the element 30 to a supporting plate. Accordingly,

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JP '082 does not disclose or teach, among other things, "a supporting bracket coupled at a middle portion thereof to the supporting plate to rotatably support the idle rollers facing the paper-discharging rollers," as presently recited in independent claim 1.

Accordingly, it is respectfully submitted that since JP '082 does not teach all of the elements presently set forth in claim 1, this claim is patentably distinguishable from JP '082, and withdrawal of this rejection and allowance of this claim are respectfully solicited.

b. Claim 10:

With respect to independent claim 10, on pages 9-10 of the Office Action, the Examiner alleges that JP '082 discloses all of the limitations of the invention as recited in this claim. However, the Applicant respectfully submits that JP '082 does not disclose or teach all of the elements of the Applicant's invention as recited in independent claim 10, for at least the following reasons.

As described above, JP '082 describes an element 30 to support the carrying rollers 33 which is attached to the opening door 25 by a screw A. See JP '082, Abstract, FIGS. 3-5. However, as illustrated in FIGS. 3-4, the screw A connects an outer portion of the element 30, outside of the area supporting the carrying rollers 33, to the opening door 25. See JP '082, FIGS. 3-5. JP '082 does not describe a middle portion of the element 30, nor describe connecting a middle portion of the element 30 to a supporting plate. Accordingly, JP '082 does not disclose or teach, among other things, "a supporting bracket having a middle portion formed between opposite ends thereof, on which the idle roller is rotatably mounted to contact the paper-discharging roller," and "a spacing adjustment unit to flexibly couple the supporting plate and the middle portion of the supporting bracket to adjust a distance between the supporting plate and the middle portion of the supporting bracket according to an external force exerted on one of the supporting plate and the supporting bracket," as presently recited in independent claim 10.

Accordingly, it is respectfully submitted that since JP '082 does not teach all of the elements presently set forth in claim 10, this claim is patentably distinguishable from JP '082, and withdrawal of this rejection and allowance of this claim are respectfully solicited.

c. Claims 11-18:

With respect to dependent claims 11-18, it is respectfully submitted that these claims depend from independent claim 10, which is patentably distinguishable from JP '082 for at least the reasons provided above. Accordingly, since these claims contain each of the features as recited in independent claim 10, dependent claims 11-18 are also patentably distinguishable from JP '082, and withdrawal of this rejection and allowance of these claims are respectfully solicited.

d. Claim 19:

With respect to independent claim 19, on page 13 of the Office Action, the Examiner alleges that JP '082 discloses all of the limitations of the invention as recited in this claim. However, the Applicant respectfully submits that JP '082 does not disclose or teach all of the elements of the Applicant's invention as recited in independent claim 19, for at least the following reasons.

As described above, JP '082 describes an element 30 to support the carrying rollers 33 which is attached to the opening door 25 by a screw A. See JP '082, Abstract, FIGS. 3-5. However, as illustrated in FIGS. 3-4, the screw A connects an outer portion of the element 30, outside of the area supporting the carrying rollers 33, to the opening door 25. See JP '082, FIGS. 3-5. JP '082 does not describe a middle portion of the element 30, nor describe connecting a middle portion of the element 30 to a supporting plate. Accordingly, JP '082 does not disclose or teach, among other things, "a supporting bracket having a middle portion formed between opposite ends thereof, on which the idle rollers are rotatably mounted to contact corresponding ones of the paper-discharging rollers," and "a spacing adjustment unit disposed between the middle portion of the supporting bracket and the supporting plate to flexibly couple the supporting plate with the middle portion of the supporting bracket to maintain a contact pressure generated between corresponding ones of the paper-discharging rollers and the idle rollers regardless of an external force exerted on one of the supporting plate and the supporting bracket," as recited in independent claim 19.

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Accordingly, it is respectfully submitted that since JP '082 does not teach all of the elements presently set forth in claim 19, this claim is patentably distinguishable from JP '082, and withdrawal of this rejection and allowance of this claim are respectfully solicited.

e. Claims 20-23:

With respect to dependent claims 20-23, it is respectfully submitted that these claims depend from independent claim 19, which is patentably distinguishable from JP '082 for at least the reasons provided above. Accordingly, since these claims contain each of the features as recited in independent claim 19, dependent claims 20-23 are also patentably distinguishable from JP '082, and withdrawal of this rejection and allowance of these claims are respectfully solicited.

f. Claim 24:

With respect to independent claim 24, on pages 14-15 of the Office Action, the Examiner alleges that JP '082 discloses all of the limitations of the invention as recited in this claim. However, the Applicant respectfully submits that JP '082 does not disclose or teach all of the elements of the Applicant's invention as recited in independent claim 24, for at least the following reasons.

As described above, JP '082 describes an element 30 to support the carrying rollers 33 which is attached to the opening door 25 by a screw A. See JP '082, Abstract, FIGS. 3-5. However, as illustrated in FIGS. 3-4, the screw A connects an outer portion of the element 30, outside of the area supporting the carrying rollers 33, to the opening door 25. See JP '082, FIGS. 3-5. JP '082 does not describe a middle portion of the element 30, nor describe connecting a middle portion of the element 30 to a supporting plate. Accordingly, JP '082 does not disclose or teach, among other things, "a supporting bracket including idle rollers facing the paper-discharging rollers, the supporting bracket flexibly mounted at a middle portion thereof to the supporting plate to maintain a constant contact pressure between the idle rollers and respective paper-discharging rollers," as recited in independent claim 24.

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Accordingly, it is respectfully submitted that since JP '082 does not teach all of the elements presently set forth in claim 24, this claim is patentably distinguishable from JP '082, and withdrawal of this rejection and allowance of this claim are respectfully solicited.

g. Claim 25:

With respect to dependent claim 25, it is respectfully submitted that this claim depends from independent claim 24, which is patentably distinguishable from JP '082 for at least the reasons provided above. Accordingly, since claim 25 contains each of the features as presently recited in independent claim 24, dependent claim 25 is also patentably distinguishable from JP '082, and withdrawal of this rejection and allowance of this claim are respectfully solicited.

Conclusion

It is respectfully submitted that a full and complete response has been made to the outstanding Office Action and, as such, there being no other objections or rejections, this application is in condition for allowance, and a notice to this effect is earnestly solicited.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided below.

If any further fees are required in connection with the filing of this amendment, please charge the same to our Deposit Account No. 502827.

Respectfully submitted,

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